

LATHAM & WATKINS LLP
Matthew Rawlinson (CA Bar No. 231890)
matt.rawlinson@lw.com
140 Scott Drive
Menlo Park, CA 94025
Telephone: +1.650.328.4600

Morgan E. Whitworth (CA Bar No. 304907)
morgan.whitworth@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: +1.415.391.0600

Susan E. Engel (*pro hac vice*)
susan.engel@lw.com
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004-1304
Telephone: +1.202.637.2200
Facsimile: +1.202.637.2201

Attorneys for Defendant Solana Labs, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC., MULTICOIN
CAPITAL MANAGEMENT LLC, and KYLE
SAMANI,

Defendants.

Case No.: 3:22-cv-03912-RFL

**DECLARATION OF SUSAN E. ENGEL IN
SUPPORT OF STIPULATION
CONTINUING DEFENDANTS' TIME TO
FILE REPLIES IN SUPPORT OF MOTIONS
TO DISMISS CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: Rita F. Lin

1 I, Susan E. Engel, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the District of Columbia and am
3 admitted *pro hac vice* to this Court and a partner of Latham & Watkins LLP, counsel of record
4 for defendant Solana Labs, Inc. (“Solana Labs”) in the above-captioned action. I submit this
5 declaration in support of the Parties’ Stipulation Continuing Defendants’ Time to File Replies in
6 Support of Motions to Dismiss Consolidated Amended Class Action. I make this declaration
7 based on my personal knowledge.

8 2. On January 12, 2024, Plaintiff filed his Consolidated Amended Class Action
9 Complaint (“Amended Complaint”) (Dkt. 68).

10 3. On April 11, 2024, Defendants Solana Labs, Multicoin Capital Management LLC,
11 and Kyle Samani (collectively, “Defendants”) filed their motions to dismiss and noticed a
12 hearing on the motions for August 6, 2024 (Dkts. 76, 80).

13 4. On May 13, 2024, Plaintiff filed his oppositions to Defendants’ motions to
14 dismiss (Dkts. 87, 88).

15 5. Defendants’ replies in support of their motions to dismiss are due June 12, 2024
16 (Dkt. 71).

17 6. In light of the complexity and length of the oppositions, as well as deadlines in
18 other matters and personal obligations for Defendants’ counsel, Defendants and Plaintiff met and
19 conferred and agreed that good cause exists for a modest extension to Defendants’ time to file
20 their replies in support of their motions to dismiss from June 12, 2024 to June 20, 2024.

21 7. On December 21, 2024, this Court granted the Parties’ stipulation providing for
22 Defendants to move to dismiss on March 12, 2024, Plaintiff to oppose on April 11, 2024, and
23 Defendants to reply on May 13, 2024 (Dkt. 67).

24 8. On February 14, 2024, this Court granted the Parties’ stipulation revising the
25 briefing schedule on Defendants’ motions to dismiss to provide that Defendants would file their
26 anticipated motions to dismiss on or before April 11, 2024, Plaintiff would file his oppositions
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1 on or before May 13, 2024, and Defendants would file their replies on or before June 12, 2024
2 (Dkt. 71).

3 9. Counsel for Plaintiff and Defendants in the above-captioned action respectfully
4 submit that good cause exists for the requested extension.

5 10. No other deadlines in this action will be affected by this extension, as the
6 August 6, 2024 hearing date will remain unchanged.

7
8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed this 23rd Day of May 2024, in Washington, District of Columbia.

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11 /s/ Susan E. Engel
12 Susan E. Engel
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